

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

MICHAEL HILL

Case No.

18-987-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 23, 2017 in the county of Berks in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

18 U.S.C. Sections 2113(a), (d) and
2

Offense Description

See Attachment "A"

FILED
JUN 15 2018
By KATE BARKMAN, Clerk
Dep. Clerk

This criminal complaint is based on these facts:

See attached affidavit.

☐ Continued on the attached sheet.

C. A. Lis

Complainant's signature

Christopher A. Lis, TFO, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

6/15/2018

City and state:

Allentown, PA.

H. S. Perkin

Judge's signature

HENRY S. PERKIN, U.S. Magistrate Judge

Printed name and title

Attachment "A"

Count One

On or about October 23, 2017, in Shillington, in the Eastern District of Pennsylvania, defendant MICHAEL HILL knowingly and unlawfully by force and violence, and by intimidation, took and obtained, and aided and abetted the taking and obtaining of, from an employee of Santander Bank, 12 Parkside Avenue, Shillington, Pennsylvania, lawful currency of the United States, that is, approximately \$4,153, belonging to, and in the care, custody, control, management and possession of Santander Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in committing this offense, defendant HILL assaulted and put in jeopardy the life of, and aided and abetted the assaulting and putting in jeopardy the life of, another person by the use of a dangerous weapon, that is, a facsimile firearm (a BB gun), in violation of Title 18, United States Code, Sections 2113(a), (d) and 2.

AFFIDAVIT IN SUPPORT OF APPLICATION FOR ARREST WARRANT

I, Christopher A. Lis, being duly sworn, hereby depose and state as follows:

INTRODUCTION AND TASK FORCE OFFICER BACKGROUND

1. I make this affidavit in support of an application for an arrest warrant under Federal Rule of Criminal Procedure 4 for the arrest of MICHAEL HILL, date of birth: August 20, 1989, relating to the offense of bank robbery and aiding and abetting bank robbery, in violation of 18 U.S.C. §§ 2113(a), (d) and 2.

2. I am a task force officer with the Federal Bureau of Investigation (FBI), Philadelphia Division, assigned to the Allentown Resident Agency. I am also a sworn police officer and detective with the Cumru Township Police Department. I have been a law enforcement officer since 1993. As part of my duties as a police officer and FBI task force officer, I investigate violations of the criminal laws and statutes of the state of Pennsylvania and United States, including but not limited to violations of 18 U.S.C. §§ 2113 and 2 (bank robbery and aiding and abetting). I have conducted hundreds of investigations into violations of the various criminal laws and statutes of the state of Pennsylvania and the United States including bank robbery.

3. The facts in this affidavit are based on my own personal knowledge, my participation in this investigation, discussions with other law enforcement officers and agents directly involved with this investigation, and my review of evidence collected in relation to this investigation. This is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. On October 23, 2017, at 1:30 p.m., Cumru Township Police Department officers responded to the report of an armed robbery that occurred at the Santander Bank, located at 12 Parkside Avenue, Shillington, Cumru Township, Berks County, in the Eastern District of Pennsylvania. At all times material to this affidavit, Santander Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, Certificate Number 29950.

5. Detective Robert Wanner interviewed a bank employee, K.R., who stated that she was working as a teller when the male actor entered the bank through the front door and approached her teller station. The male actor displayed what K.R. believed was a handgun that he held in his right hand. The male actor threw a black bag at K.R. while stating, "Don't waste my fucking time, give me all the money." K.R. then removed a sum of cash from her station and placed the money inside the black bag, which she handed back to the male actor who then fled the bank with the black bag. K.R. described the actor as a Caucasian male, in his forties, 5'7" in height, light colored hair, large build, and blue eyes. The actor was wearing a hooded black shirt or jacket with the hood up, a fitted hat beneath the hood, and dark pants. K.R. described the handgun as black in color.

6. Detective Wanner interviewed another witness, N.W., who observed the male actor go across the shopping center parking lot from Santander Bank to a waiting silver SUV. The male actor appeared to be a female with a husky build and blonde hair. The actor was wearing a black hooded sweatshirt, yellow gloves, and mask, all of which the actor removed before entering the passenger side of the silver SUV, which displayed Pennsylvania plate KLW0445. The vehicle then fled the scene.

7. While at the Santander Bank, detectives reviewed surveillance video of the robbery in progress, which was consistent with the witnesses' descriptions of the heist and the robber.

8. According to Pennsylvania Department of Transportation records, Pennsylvania license plate KLW0445 is registered to Shannon Quinones, whose Pennsylvania driver's license listed an address of 1214 Schuylkill Avenue, Reading, Pennsylvania.

9. At approximately 2:05 p.m., no more than 35 minutes after the Santander Bank armed robbery, Spring Township Police Department Detective Timothy Katzaman observed a silver in color Chevrolet Trailblazer, displaying Pennsylvania plate KLW0445, (hereinafter getaway vehicle) parked unattended in the 1200 block of Schuylkill Avenue, Reading City, Berks County, Pennsylvania. Detectives Katzaman and Corey Huntsinger maintained surveillance of the getaway vehicle.

10. Detective Huntsinger next observed two men, a white male later identified as Shawn Quinones, and a black male later identified as MICHAEL HILL, leave the residence at 1214 Schuylkill Avenue, and enter the getaway vehicle, which was then driven approximately two blocks to "On The Avenue Auto" located at 1420 Schuylkill Avenue, Reading City, Berks County, Pennsylvania.

11. Once there, Quinones made a \$120 cash payment for his silver 2003 Chevrolet Trailblazer (the getaway vehicle), and another \$120 cash payment for MICHAEL HILL's 2006 Pontiac G6. M. E., an employee at the dealership, accepted the \$240 from Quinones, but noticed that the money Quinones had handed to him was wet, and asked why. Quinones replied, "You wouldn't believe me." The U.S. currency consisted of denominations that were consistent with the currency that was stolen during the bank robbery.

12. At 2:35 p.m., law enforcement officers approached and detained Shawn Quinones and MICHAEL HILL at "On The Avenue Auto." Quinones admitted his identity. Quinones also admitted that he lived on the first floor of the residence located at 1214 Schuylkill Avenue, Reading, Pennsylvania with HILL. As Quinones spoke with the officers, the officers observed that he matched the description of the robber.

13. The detectives then arrested Shawn Shannon Quinones and MICHAEL HILL. HILL was in possession of a cellular telephone, that was an LG Smartphone, black in color. Quinones did not have a cell phone on his person, but later that day, an employee of the dealership found a an LG Smartphone, black in color on the premises with a cell phone holder with a Pennsylvania ID for Shawn Quinones, and a purple wallet.

14. Officers searched MICHAEL HILL subsequent to his arrest at the police station and found \$2,517 in U.S. currency in the following denominations: \$1,100 in \$100 bills in HILL's pants pocket, \$1,217 (67 x \$1 bills – 10 x \$5 bills – 20 x \$10 bills – 9 x \$100 bills) in HILL's shoe, and \$200 (2 x \$100 bills) in HILL's wallet. The currency consisted of denominations that were consistent with the U.S. currency stolen during the bank robbery.

15. Later that same day, October 23, 2017, detectives and officers executed a search warrant at 1214 Schuylkill Avenue, Reading, Pennsylvania, the address for the residence of Shawn Quinones and MICHAEL HILL. Detectives found a black hooded sweatshirt, a black neoprene face mask, gray colored gloves, a black Daisy Powerline 426 BB pistol, which matched the description and video surveillance images of the weapon used to commit the bank robbery. Detectives also recovered \$1,345 in cash that was in a black bag hanging on the door to an interior kitchen closet.

16. Shawn Quinones was subsequently interviewed by FBI Agent Alan Jones in December 2017 and stated that he and MICHAEL HILL planned and executed the robbery of Santander Bank in Shillington, Pennsylvania on October 23, 2017.

17. In May 2018, the FBI served grand jury subpoenas on the used car retailer, "On the Avenue Auto," located at 1420 Schuylkill Avenue in Reading, Pennsylvania for records related to the September 1, 2017 sales of a 2003 Chevrolet Trailblazer SUV to Shawn Shannon Quinones and a 2006 Pontiac G6 to MICHAEL HILL. The records revealed that Quinones provided a "home phone" number of (610) 741-8405, a cellular telephone account for which Sprint was the carrier. The records further revealed that HILL provided a "cell phone" number of (610) 818-8787, a cellular telephone account for which Sprint was the carrier.

18. On June 6, 2018, the U.S. Attorney's Office for the Eastern District of Pennsylvania and the FBI sought and obtained an order authorizing the disclosure to the government of historical originating and terminating call detail information and cell site information relating to telephone numbers (610) 741-8405 and (610) 818-8787. Sprint provided the records to the FBI shortly after the issuance of the order. The records show that the cellular telephones assigned to telephone numbers (610) 741-8405 and (610) 818-8787, were in communication with each other during the Santander Bank robbery on October 23, 2017. The records also show that both telephones assigned to these telephone numbers were physically located within range of, and in communication with, the cell tower providing service to the geographical location of Santander Bank, 12 Parkside Avenue, Cumru Township, Berks County, Pennsylvania.

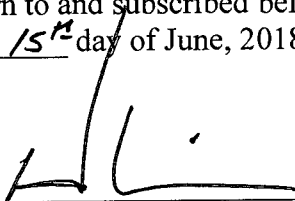
19. Because of the above facts, your affiant believes that there is probable cause to charge MICHAEL HILL with committing one count of bank robbery in the Eastern District of Pennsylvania on or about October 23, 2017, in violation of 18 United States Code Section 2113(a), (d) and 2.

Respectfully Submitted,



Christopher A. Lis
Task Force Officer
Federal Bureau of Investigation

Sworn to and subscribed before me
this 15th day of June, 2018.



HENRY S. PERKIN
United States Magistrate Judge